March 2021

To the Climate Change Commission

Please find below DPA’s submission on the Climate Change Commission’s advice to Government 2021.

## Disabled Persons Assembly NZ

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# Introducing Disabled Persons Assembly NZ

The Disabled Persons Assembly NZ (DPA) is a pan-impairment disabled person’s organisation that works to realise an equitable society, where all disabled people (of all impairment types and including women, Māori, Pasifika, young people) are able to direct their own lives. DPA works to improve social indicators for disabled people and for disabled people to be recognised as valued members of society. DPA and its members work with the wider disability community, other DPOs, government agencies, service providers, international disability organisations, and the public by:

* telling our stories and identifying systemic barriers
* developing and advocating for solutions
* celebrating innovation and good practice

# The submission

DPA welcomes the fact that the draft advice recognises that disabled people are ***amongst the most adversely affected groups*** in relation to climate change and the group that faces the largest barriers in responding to the effects of climate change.

Every aspect of climate change affects disabled people. Given the wide-ranging extent of the advice provided by the Climate Change Commission (CCC), we have restricted our feedback to those areas that have the most serious impact for disabled people or where we believe that there is specific disability advice needed.

# The United Nations Convention on the Rights of Persons with Disabilities (UNCRPD)

Many of the articles and principles contained in the UNCRPD are relevant to the CCC advice. We highlight those most relevant to the CCC advice to government below:

## Article 3 - General Principles

1. Respect for inherent dignity, individual autonomy including the freedom to make one’s own choices, and independence of persons;
2. Non-discrimination;
3. Full and effective participation and inclusion in society;
4. Respect for difference and acceptance of persons with disabilities as part of human diversity and humanity;
5. Equality of opportunity;
6. Accessibility;
7. Equality between men and women;
8. Respect for the evolving capacities of children with disabilities and respect for the right of children with disabilities to preserve their identities.

## Article 4.3 - Actively engage with organisations of disabled people

## Article 9 - Accessibility

## Article 11 - Situations of risk and humanitarian emergencies

## Engagement with Disabled People

DPA is pleased to see that the draft advice urges Government to proactively engage with disabled people to ensure an equitable transition to a low carbon society. We are deeply concerned that without this proactive engagement that we will be negatively impacted both by the direct effects of climate change and by the policy responses that aim to reduce or mitigate climate change, which will result in disabled people being further marginalised as a group.

DPA recommends

Recommendation 1 **–** that the Climate Change Commission set up a disability forum or committee to lead and support its work in relation to climate change and climate justice for disabled people.

Recommendation 2 **-**  that the Climate Change Commission advice stresses to Government the ongoing importance of engagement with disabled people and our organisations.

Recommendation 3 **–** that the Climate Change Commission advice contains a specific recommendation on a just transition to a low-carbon economy for disabled people. This recommendation should recognise disabled people as experts in our own lives and our leadership in the response to climate change. We suggest that the recommendation read:

 ***In order to ensure a just transition to a low-carbon economy for disabled people, government should engage with disabled people and their organisations in the implementation of climate change policy. Such engagement should recognise disabled people’s expertise in their own lives and the leadership that disabled people can provide in this transition given their expertise in developing solutions to navigating an inaccessible world.***

## Transport

The Climate Change Commission’s draft advice recognises the need to move to the adoption of more electric vehicles, to increase walking and cycling, and to improve public transport. DPA agrees that such moves are necessary in order to limit the effects of climate change and to keep society moving. However, such changes to transport can either increase or decrease barriers for disabled people depending on whether there is active engagement with disabled people that ensures our needs are fully considered and met. For example, not everyone can walk or cycle or walk or cycle far, often when walking and cycling is prioritised it can lead to less carparks, which means that people who need to park close to where they are going because of mobility impairments cannot. The lack of close car parks may stop some disabled people from taking a trip, even an essential one. Constructive engagement with disabled people can mitigate such issues.

## Electric Vehicles

While electric vehicles undoubtedly are better for the planet than petrol or diesel vehicles, they do create significant issues for disabled people:

* They tend to be **more expensive** and are therefore out of reach for many disabled people who live in poverty.
* They tend to be **smaller**, making it difficult or impossible for some disabled people requiring larger wheelchairs and other equipment, to use them.
* They are **much quieter** than conventional vehicles, posing a safety risk to disabled people, older people and children.
* **Charging points** and related infrastructure **need to be accessible** in order for disabled people to independently use electric vehicles.

DPA recommends:

Recommendation 4 **–** that the Climate Change Commission advises Government to, in consultation with disabled people, implement standards on both the minimum noise level and the type of noise to be omitted by electric vehicles. Furthermore, it is important that this noise cannot be turned off by the driver. This would reduce the risk of accident to disabled people and would improve safety across the population.

Recommendation 5 **–** that the Climate Change Commission advises Government to set up a grant or subsidy to support disabled people to purchase suitable electric vehicles so that disabled people who need larger vehicles to transport wheelchairs are not disadvantaged by the phasing out of more affordable petrol and diesel versions.

## Increased Walking and Cycling

DPA supports the advice to Government that walking and cycling needs to be increased. However, just stating this won’t make pavements and footpaths safer or easier to navigate for disabled people. Bikes, scooters and other micro mobility devices pose significant issues for disabled people when used on footpaths and should be restricted to cycle lanes where they exist, and the road where they do not, for the safety and comfort of all pedestrians.

DPA recommends

Recommendation 6 **-**  that the Climate Change Commission provide explicit advice to Government that footpaths should be well maintained, and that bikes, scooters and other micro mobility devices should not generally be allowed on footpaths.

## Public Transport

DPA is pleased that the CCC’s draft advice to Government recognises that public transport isn’t always an option for some disabled people and that many disabled people are reliant on driving or being driven. However, there are other disabled people who are highly reliant on public transport because they cannot drive.

DPA would like the CCC to advise Government that all public transport must be accessible to disabled people. The co-benefit of this is that older people, people travelling with small children and others with restricted mobility would benefit also.

We also support the CCC’s advice regarding targeted subsidised public transport fares for groups who are transport disadvantaged.

DPA recommends:

Recommendation 7 **–** that the Climate Change Commission provide advice to Government on the need for accessible public transport and targeted fair subsidies for disabled people.

## Housing

DPA supports the advice that new homes will need to be significantly more energy efficient than current ones. However, if houses aren’t accessible to disabled people, their energy efficiency doesn’t really matter. We strongly urge the CCC to advise Government that new houses should meet universal design standards for accessibility. This would not only mean that disabled people could benefit from warmer, dryer, more energy efficient homes, but it would have the added benefit of allowing older people to age in place.

DPA recommends:

Recommendation 8 **–** that the Climate Change Commission provide advice to Government that all new houses should meet universal design standards so that they can easily be made accessible.

## Domestic Heating

DPA is pleased that the CCC’s draft advice recognises that disabled people will benefit from making energy efficiency improvements to their homes. We agree that support will need to be given up front to disabled people to help with the cost of energy efficiency improvements. Disabled people are less likely to own their own homes and are more likely to live in rented accommodation, so we welcome the introduction of standards for heating and insulation in rented accommodation. We agree that Government will need to monitor rental affordability as a result of the introduction of these standards.

In addition, the move to reliance almost exclusively on electricity for domestic purposes, while necessary for a transition to a low-carbon economy, does present some dangers for some disabled people who are reliant on electricity for apparatus such as ventilators. A power outage or power disruption could be life threatening for some disabled people, so we believe that the CCC needs to provide advice to Government on the duties of power companies to ensure electricity supply to disabled people who require a constant supply for medical reasons.

## Health

The CCC’s draft advice to Government has a significant focus on the co-benefits of health promotion and improvement. DPA is concerned that, because health and disability are often conflated, that a narrow focus on health rather than on wellbeing will result in neglecting the wider systemic changes that are urgently needed to improve wellbeing for disabled people. We strongly recommend that the advice talk about wellbeing rather than just health.

We recommend

Recommendation 9 **–** that the Climate Change Commission reframe this part of its advice to Government in terms of wellbeing rather than health.

## Waste

Many disabled people are keen to do their part to reuse, recycle and repurpose waste. However, this is not always easy for us:

* How do blind people know what can and cannot be recycled if they are unable to read the letters promoting the ability to recycle? Accessing information on recycling, reusing and repurposing isn’t always accessible to us, and systems for waste disposal, reusing or recycling are not always physically accessible either.
* Disabled people are not always in control of the disability-related products we are supplied with by District Health Boards and other disability service providers such as continence products. We have to use what we are given and don’t have choices around buying a product that is more environmentally friendly.
* There is a need for initiatives that work with the disability community to find new, innovative ways for dealing with our waste in ways that are progressively more environmentally sustainable.

DPA recommends

Recommendation 10 **–** that the Climate Change Commission advise Government to set up and fund programmes that support disabled people to manage their household waste more sustainably.

Recommendation 11 **–** that the Climate Change Commission advise Government to review products supplied to disabled people through government supported schemes (DHB’s, etc.) to ascertain if more environmentally-friendly products are available and supply them where appropriate.

## Jobs

DPA is disappointed that there is no mention in the CCC’s draft advice of employment for disabled people, reasonable accommodation or flexible working. Disabled people will continue to face discrimination and high rates of unemployment if an environmentally sustainable economy doesn’t explicitly include initiatives and support in employment and job seeking for disabled people.

DPA recommends

Recommendation 12 **–** that the Climate Change Commission explicitly state in its Advice to Government the need for support, advice and education as regards disabled workers and jobseekers.

# Summary of DPA’s recommendations

DPA recommends the following

1. That the Climate Change Commission set up a disability forum or committee to lead and support its work in relation to climate change and climate justice for disabled people.
2. That the Climate Change Commission advice stresses to Government the ongoing importance of engagement with disabled people and our organisations.
3. That the Climate Change Commission advice contains a specific recommendation on a just transition to a low-carbon economy for disabled people. This recommendation should recognise disabled people as experts in our own lives and our leadership in the response to climate change. We suggest that the recommendation read:

***In order to ensure a just transition to a low-carbon economy for disabled people, government should engage with disabled people and their organisations in the implementation of climate change policy. Such engagement should recognise disabled people’s expertise in their own lives and the leadership that disabled people can provide in this transition given their expertise in developing solutions to navigating an inaccessible world.***

1. That the Climate Change Commission provide advice to Government that New Zealand, in consultation with disabled people, implement standards on both the minimum noise level and the sort of noise to be omitted by electric vehicles. Furthermore, it is important that this noise cannot be turned off by the driver. This would not only reduce the risk of accident to disabled people but would improve safety across the population.
2. That the Climate Change Commission advise Government to set up a grant or subsidy to support disabled people to purchase suitable electric vehicles so that disabled people who need larger vehicles to transport wheelchairs are not disadvantaged by the phasing out of more affordable petrol and diesel versions.
3. That the Climate Change Commission provide explicit advice to Government that footpaths should be well maintained, and that bikes, scooters and other micro mobility devices should not generally be allowed on footpaths.
4. That the Climate Change Commission provide advice to Government on the need for accessible public transport and targeted fair subsidies for disabled people.
5. That the Climate Change Commission provide advice to Government that all new houses should meet universal design standards so that they can easily be made accessible.
6. That the Climate Change Commission frame its advice to Government in terms of wellbeing rather than health.
7. That the Climate Change Commission advise Government to set up and fund programmes that support disabled people to manage their household waste more sustainably.
8. That the climate Change commission advise Government to review all disability products supplied to disabled people through government supported schemes (DHB’s, etc.) to ascertain if more environmentally-friendly products are available and supply them where appropriate.
9. That the Climate Change Commission explicitly state in its Advice to Government the need for support, advice and education as regards disabled workers and jobseekers.